



August 10, 2021

VIA ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *United States v. Trevon Gross*, 15-cr-769-3 (AJN)
Travel Request

Dear Judge Nathan:

I write on behalf of defendant Trevon Gross to seek a modification of the terms of his supervised release to allow him to travel to Lakeland, Florida to meet with his dissertation advisor, Dr. Joshua Henson, to plan his research for his dissertation. Due to the prevalence of the delta variant of COVID-19, and in order to limit his exposure, Mr. Gross seeks to travel by car, arriving in Florida on August 16 and returning home on August 20.

As set forth in the attached letter from Dr. Henson, *see* Ex. A, Dr. Henson would like to meet with Mr. Gross in person, as opposed to remotely, because there is an extensive library on campus that is relevant to Mr. Gross's research, and Dr. Henson would like to have several in person meetings with Mr. Gross to plan out his research approach, which includes the interpretation of texts. This type of research and collaboration is most effective in an in person setting.

Mr. Gross is unable to postpone this travel until after May 2022, when he will no longer be on home detention, because his dissertation must be completed by Spring 2022. *See* Ex. B, Academic Dashboard (noting that the dissertation deadline was extended to Spring 2022), and his research must be completed well in advance of that. Additionally, Mr. Gross seeks to meet with Dr. Henson now, in August, because it is the only time that works for Dr. Henson because he will soon begin school, during which he has duties as a professor. For these reasons, Mr. Gross respectfully requests that this travel request be granted.

I have conferred with the Government and Probation and they oppose this request.
Thank you for your consideration.

Very truly yours,

/s/ Kristen M. Santillo
Kristen M. Santillo

CC: AUSA Won S. Shin
Probation Officer Kevin Villa